

**IN THE UNITED STATES BANKRUPTCY COURT
Southern District of Ohio
Eastern Division**

In the Matter of:

Samuel Owusu Sarkodee

Debtor(s)

} Case No. 2:17-bk-56684
} Chapter 7
} Judge C. Kathryn Preston

MOTION TO EXTEND TIME FOR ISSUING THE DISCHARGE

Now comes the Debtor, Samuel Owusu Sarkodee, and moves this Court, pursuant to 11 U.S.C. 524(c) and B.R. 4008(a), for an order extending the time for granting the discharge and for filing a reaffirmation agreement to allow Debtor to enter into a reaffirmation agreement with Caliber Home Loans, Inc. for the mortgage on Debtor's house. An extension of approximately 90 days is requested. The reasons for this Motion are more fully set forth in the attached Memorandum in Support.

Respectfully submitted,

MINA NAMI KHORRAMI, LLC

by: /s/ Mina Nami Khorrami
Mina Nami Khorrami (0058350)
115 W. Main Street, Suite LL-50
Columbus, OH 43215
(614) 857-9590
(614) 304-0102/Fax
mnkecf@mnk-law.com
<http://mnk-law.com>

MEMORANDUM IN SUPPORT

Debtor filed the within case on October 18, 2017. The 341 meeting of creditors was held on November 20, 2017. Debtor wishes to enter into a reaffirmation agreement with Caliber Home Loans, Inc. regarding the mortgage on his residence, and is requesting additional time in

order for the agreement(s) to be filed. It is Debtor's intention to keep his house and he wishes to enter into a reaffirmation agreement with Caliber Home Loans, Inc. and so that the payments on the reaffirmed loan will be reported on his credit history. Debtor anticipates that it will take approximately 90 days, until April 20, 2018, for the reaffirmation agreement to be prepared and signed by all parties and filed with the Court.

WHEREFORE, Debtor requests that the time for granting his discharge be extended by approximately 90 days, until after April 20, 2018.

Respectfully submitted,

MINA NAMI KHORRAMI, LLC

by: /s/ Mina Nami Khorrami
Mina Nami Khorrami (0058350)
115 W. Main Street, Suite LL-50
Columbus, OH 43215
(614) 857-9590
(614) 304-0102/Fax
mnkecf@mnk-law.com
<http://minaklaw.com>

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2018, a copy of the foregoing MOTION TO EXTEND TIME FOR ISSUING THE DISCHARGE was served on the following registered ECF participants, **electronically** through the court's ECF System at the email address registered with the court.:

U.S. Trustee
Christal L. Caudill, Trustee
jwright@weltman.com

and on the following by **ordinary U.S. Mail** addressed to:

Samuel Owusu Sarkodee
3928 Rhine Lane
Groveport, OH 43125

Caliber Home Loans, In
Po Box 24610

Oklahoma City, OK 73124

Jason Wright
Weltman, Weinberg & Reis
965 Keynote Cir
Brooklyn Heights, OH 44131

/s/Mina Nami Khorrami
Mina Nami Khorrami (0058350)
Attorney for Debtor